

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

PHILIP GODLEWSKI
115 Huckleberry Lane,
Duryea, PA 18642.

Plaintiff,

vs.

JEANETTE JOY GEARY
1829 Quail Ridge Rd.
Raleigh, NC 27609.

Defendant.

NO. 21-2178-RDM

CIVIL ACTION

JURY TRIAL DEMANDED

MOTION FOR PRELIMINARY INJUNCTIVE RELIEF

By and through his undersigned counsel, the Plaintiff hereby moves the Court for preliminary injunctive relief against the Defendant for the reasons set forth in his attached Memorandum of Law on which he relies and which is incorporated herein.

The Plaintiff moves the Court to enter the attached Order granting injunctive relief against the Defendant, granting all such relief as the Court deems necessary in this matter.

Respectfully submitted,

KOLMAN LAW P.C.

BY: s/Timothy M. Kolman
Timothy M. Kolman, Esquire
Attorney for Plaintiff
414 Hulmeville Avenue
Penndel, PA 19047
(215) 750-3134

December 30, 2021